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June 29, 2016

Via Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 14-58

2016 ETC Annual Report of UBTA-UBET Communications, Inc.

Study Area Code 502287

Dear Ms. Dortch:

On behalf of UBTA-UBET Communications, Inc. ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information. The redacted version is being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the Company's Five-Year Service Quality Improvement Plan Progress Report required by Section 54.313.

Please direct any questions regarding the filing to the undersigned.

Sincerely.

John Kuykendall JSI Vice President 301-459-7590

jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313.



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June 29, 2016

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 14-58

2016 ETC Annual Report of UBTA-UBET Communications, Inc.

Study Area Code 502287 Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client UBTA-UBET Communications, Inc. (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules, withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

- 1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
- 2. Pursuant to Section 54.313, Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2016 Report.⁴
- 3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Progress Report provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313.

- 4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.
 - In its March 5, 2013 Order, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories." The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.
- 5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
- 6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

⁵ See Connect America Fund et al., WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

the attachment under seal. The Company uses the information contained in the Progress Report to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

- 7. Any previous versions of this information are not publicly available.
- 8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
- 9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Progress Report provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

FCC For	rm 481 - Carrier Annual Reporting Data Collection Form	REDACTED FOR PUBLIC INSPECTION	PCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	502287	
<015>	Study Area Name	UBTA-UBET Communications, Inc	
<020>	Program Year	2017	
<030>	Contact Name: Person USAC should conta with questions about this data	ct Karl Searle	
<035>	Contact Telephone Number: Number of the person identified in data lir	4356225472 ext. ne <030>	
<039>	Contact Email Address: Email of the person identified in data line	<pre><030> ksearle@stratanetworks.com</pre>	
	Form Tv	/pe 54.313 and 54.422	

-	ervice Quality Improvement Reporting Ollection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013			
<010>	Study Area Code	502287				
<015>	Study Area Name	UBTA-UBET Comm	unications, Inc			
<020>	Program Year	2017				
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle				
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext				
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@strata	networks.com			
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	(yes /	no) O			
<111>	year plan" filed with the FCC?	(yes /	no) O O			
<112>	If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your CETC which only receives frozen support, your progress report is only required to address voice telephony service.		02287UT112.pdf			
	Please select the appropriate responses below (Yes, No, Not Applicable) to conf that the attached document(s), on line 112, contains a progress report on its fiv service quality improvement plan pursuant to §54.202(a). The information shall submitted at the wire center level or census block as appropriate.	e-year		Name of Attached Document		
<113>	Maps detailing progress towards meeting plan targets		Yes			
<114>	Report how much universal service (USF) support was received		Yes			
<115>	How much (USF) was used to improve service quality and how support was used to improve	ove service quality	Yes			
<116>	How much (USF) was used to improve service coverage and how support was used to im-	prove service covera	ge Yes	7		
<117>	How much (USF) was used to improve service capacity and how support was used to imp	rove service capacit	Yes	1		
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.		Not Applicable]		

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code											
<015>	Study Area Na	ame				UBTA-UBET	Communications, In	с				
<020>	Program Year				2017	2017						
<030>	Contact Name - Person USAC should contact regarding this data				Karl Sear	Karl Searle						
<035>	Contact Telep	hone Number	- Number of pe	erson identified	in data line <0	30> ⁴³⁵⁶²²⁵⁴⁷	2 ext.					
<039>	Contact Email	Address - Ema	il Address of p	erson identified	l in data line <0	30> ksearle@s	tratanetworks.com					
<210>	<210> For the prior calendar year, were there any reportable voice service outages? No											
<220>	<a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h>></h>
	NODC									Did This Outses		

<a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<t></t>	<g></g>	<h></h>
NORS									Did This Outage		
	Outage Start	Outage Start	Outage End	Outage End	Number of		911 Facilities	Service Outage	Affect Multiple		
Number	Date	Time	Date	Time	Customers Affected	Total Number of	Affected			Comico Outoro	Preventative
Number	Date	Time	Date	Time	customers Affected			Description (Check	Study Areas	Service Outage	
						Customers	(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures

	ulfilled Service Request ection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Contro July 2013	ol No. 3060-0819	
<010>	Study Area Code		502287			
<015>	Study Area Name		UBTA-UBET Communications, Inc			
<020>	Program Year		2017			
<030>	Contact Name - Person USAC should contact regarding	ng this data	Karl Searle			
<035>	Contact Telephone Number - Number of person iden	ntified in data line <030>	4356225472 ext.			
<039> Contact Email Address - Email Address of person identified in data line <030> ksearle@stratanetworks.com						
<300> Ur	nfulfilled service request (voice)		0			
<310> D	etail on attempts (voice)					
		Name	e of Attached Document			
<320> Unfulfilled service request (broadband)			0			
<330> Detail on attempts (broadband)						_
		N	lame of Attached Document			

(400) Number of Complaints per 1,000 customers	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2017
<030>	Contact Name - Person USAC should conta	ct regarding this data Karl Searle
<035>	Contact Telephone Number - Number of p <030>	erson identified in data line 4356225472 ext.
<039>	Contact Email Address - Email Address of p <030>	erson identified in data line ksearle@stratanetworks.com
<400>	Select from the drop-down list to indicate voice complaints (zero or greater) for voice calendar year for each service area in which any facilities you own, operate, lease, or of	telephony service in the prior Offered only fixed voice nyou are designated an ETC for
<410>	Complaints per 1000 customers for fixed v	oice 0.0
<420>	Complaints per 1000 customers for mobile	voice
<430>	Select from the drop-down list to indicate end-user customer complaints (zero or greathe prior calendar year for each service are an ETC for any facilities you own, operate,	ater) for broadband service in Offered only fixed broadband a in which you are designated
<440>	Complaints per 1000 customers for fixed b	roadband 0.27
<450>	Complaints per 1000 customers for mobile	broadband

•	npliance With Service Quality Standards and Consumer Protection Rules ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	502287	_
<015>	Study Area Name	UBTA-UBET Communications, Inc	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle	
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com	
<500>	Certify compliance with applicable service quality standards and consumer pro-	otection rules Yes	
<510>	Descriptive document for Service Quality Standards & Consumer Protection Ru	502287UT510.pdf ules Compliance	

Data C	Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	502287	
<015>	Study Area Name	UBTA-UBET Communications, Inc	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle	
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com	
<600>	Certify compliance regarding ability to function in emergency situations	Yes	
<610>	Descriptive document for Functionality in Emergency Situations	502287UT610.pdf	

FCC Form 481

(600) Functionality in Emergency Situations

(700) Price Offerings including Voice Rate Data		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	502287	
<015> Study Area Name	UBTA-UBET Communications, Inc	
<020> Program Year	2017	
<030> Contact Name - Person USAC should contact regarding this data	Karl Searle	
<035> Contact Telephone Number - Number of person identified in data	line <030> 4356225472 ext.	
<039> Contact Email Address - Email Address of person identified in data	line <030> ksearle@stratanetworks.com	
<701> Residential Local Service Charge Effective Date <702> Single State-wide Residential Local Service Charge		

<703>	<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
					Residential Local			Mandatory Extended Area	
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
					See at	tached worksheet			
					000 a	taonoa workonoot			

(710) Broadbrand Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code 51	02287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c></c>	<d1></d1>	<d2></d2>	<d3></d3>	<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select }
				 See attack worksheet - 	hed				
				, romanout					

	erating Companies ection Form		FCC Form 481 OMB Control No. 306 July 2013	0-0986/OMB Control No. 3060-0819
<010>	Study Area Code		502287	
<015>	Study Area Name		UBTA-UBET Communications, Inc	·
<020>	Program Year		2017	
<030>	Contact Name - Person l	JSAC should contact regarding this data	Karl Searle	
<035>	Contact Telephone Num	ber - Number of person identified in data line <030>	4356225472 ext.	
<039>	Contact Email Address -	Email Address of person identified in data line <030>	ksearle@stratanetworks.com	
<810>	Reporting Carrier	UBTA-UBET Communications		
<811>	Holding Company	Not Applicable		
<812>	Operating Company	UBTA-UBET Communications		

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
-			
-			
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-	See atta	ached workshe	et
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(900) Tril	(900) Tribal Lands Reporting FCC Form 481			
Data Col	lection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
<010>	Study Area Code	502287		
<015>	Study Area Name	UBTA-UBET Communications, Inc		
<020>	Program Year	2017		
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle		
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.		
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com		
<900>	Does the filing entity offer tribal land services? (Y/N)	Yes		
<910>	Tribal Land(s) on which ETC Serves	UTE Indian Tribe - Uintah and Ouray		
<920>	Tribal Government Engagement Obligation	502287UT920.pdf		
		Name of Attached	Document	

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921>	Needs assessment and deployment planning with a focus on Tribal
	community anchor institutions.
<922>	Feasibility and sustainability planning;

<923> Marketing services in a culturally sensitive manner;

<924> Compliance with Rights of way processes

<925> Compliance with Land Use permitting requirements

<926> Compliance with Facilities Siting rules

<927> Compliance with Environmental Review processes

<928> Compliance with Cultural Preservation review processes

<929> Compliance with Tribal Business and Licensing requirements.

Select
Yes or No or
Not Applicable
Yes
Yes

(1000) \/	Dice and Broadband Service Rate Comparability	DACTED	FCC Form 481
	·		
Data Coll	ection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
			July 2013
<010>	Study Area Code		502287
<015>	Study Area Name		UBTA-UBET Communications, Inc
<020>	Program Year		2017
<030>	Contact Name - Person USAC should contact regarding this data		Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line	e <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data lin	e <030>	ksearle@stratanetworks.com
<1000>	Voice services rate comparability certification	Yes	s
<1010>	Attach detailed description for voice services rate comparability compliance	5022	287UT1010.pdf
			Name of Attached Document
<1020>	Broadband comparability certification		s - Pricing is no more than the most recent applicable benchmark announced by e Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance	5022	87UT1030.pdf
			Name of Attached Document

(1100) N	o Terrestrial Backhaul Reporting		FCC Form 481		
Data Col	lection Form		OMB Control No. July 2013	3060-0986/OMB Control No. 3060-0819	
<010>	Study Area Code	502287			
<015>	Study Area Name	UBTA-UBET Communications, Inc			
<020>	Program Year	2017			
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle			
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.			
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com			
<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yes			
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 upstream within the supported area pursuant to § 54.313(g).	kbps			

(1200) Te	rms and Condition for Lifeline Customers		FCC Form 481
Lifeline			OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Coll	ection Form		July 2013
•			
<010>	Study Area Code	502287	
<015>	Study Area Name	UBTA-UBET Communications, Inc	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle	
<035>	Contact Telephone Number - Number of person identified in data line <030	> 4356225472 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <03	0> ksearle@stratanetworks.com	
		502287UT1210.pdf	
		502207011210.pdf	
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		
		Na	ame of Attached Document
<1220>	Link to Public Website HTTP		
	·		
((D)	and the same have a halo who have the the attended do somewhich and in a 1240		
	neck these boxes below to confirm that the attached document(s), on line 1210,		
	bsite listed, on line 1220, contains the required information pursuant to		
	(a)(2) annual reporting for ETCs receiving low-income support, carriers must		
annually r	report:		
<1221>	Information describing the terms and conditions of any voice	İ	
\12Z1>	telephony service plans offered to Lifeline subscribers,		
.4222	Details on the number of minutes provided as part of the plan.	1	
<1222>	Details on the number of minutes provided as part of the plan,		
<1223>	Additional charges for toll calls, and rates for each such plan.		
	<u>-</u>	ı	

(2000) Prio	e Cap Carrier Additional Documentation	FCC Form 481
	ction Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including F	ate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	July 2013
<010>	Study Area Code 502287	
	Study Area Name UBTA-UBET Communica	utions, Inc
	Program Year 2017	
<030>	Contact Name - Person USAC should contact regarding this data Karl Searle	
<035>	Contact Telephone Number - Number of person identified in data line <030> 4356225472 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030> ksearle@stratanetwo	orks.com
		cipient of Incremental High Cost support, High Cost support to offset access charge reductions,
and Cor	nect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The infor	mation reported on this form and in the documents attached below is accurate.
ı	ncremental Connect America Phase I reporting	
<2010>	• •	
<2010>	, ,, ,,,	
	2016 certification, this applies to Round 2 recipients of Incremental	
	Support	
<2011>	3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1	
	2016 certification, this applies to Round 1 recipients of Incremental	
	Support	
42022 5	• •	
<2022>		
	acceptance of funding pursuant to 54.312(c), that the locations in	
	question are not receiving support under the Broadband Initiatives	
	Program or the Broadband Technology Opportunities Program for	
	projects that will provide broadband with speeds of at least 4	
	Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	
<2023>	The attachment on line 2024 includes a statement of the total amount	of
	capital funding expended in the previous year in meeting Connect	
	America Phase I deployment obligations, accompanied by a list of cens	us
	blocks indicating where funding was spent. This covers year two -	
	54.313(b)(2)(ii). Round 2 recipients only.	
<2024	> Round 2 Recipient of Incremental Support?	
<2024B	> Attach list of census blocks indicating where funding was spent in year	Name of Attached Document Listing
	two - 54.313(b)(2)(ii). Round 2 recipients only.	Required Information
<2025A		
\2023F	Nound 1 of Nound 2 Necipient of meremental support.	
<2025B	> Attach geocoded Information for Phase I milestone reports (Round 1 fo	or Name of Attached Document Listing
\ZUZJL	• • • • • • • • • • • • • • • • • • • •	<u> </u>
	year three and Round 2 for year two) - Connect America Fund , WC	Required Information
	Docket 10-90, Report and Order, FCC 13-	
<2015>	2016 and future Frozen Support Certification 47 CFR § 54 313(c)(4)	

Data Collection For	orrier Additional Documentation (Continued) om eturn Carriers affiliated with Price Cap Local Exchange Carriers	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<2016>	Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} Certification support used to build broadband t America Phase II Reporting {47 CFR § 54.313(e)}	
<2017A>	Connect America Fund Phase II recipient?	
<2017B>	Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price	Name of Attached Document Listing Required Information
<2018>	cap carrier used for capital expenditures in 2015. Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)	Name of Attached Document Listing Required Information
<2019>	Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)	
<2020>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)	
<2021>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)	
<2026>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)	
<2027>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)	

(3005) Rate Of Return Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

	Progress Report on 5 Year Plan			
(3009)	Carrier certifies to 54.313(f)(1)(iii)			
		Yes - Attach (Certificatio	n
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}		502	2287UT3010b.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing R Information	equired	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	Г	
(3012B)	Please Provide Attachment	Name of Attached Document Listing R Information	equired	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)		
(3014)	If yes, does your company file the RUS annual report	(Yes/No)		
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	_ <u> </u>		
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	_ <u>/</u>	51	02287UT3017.pdf
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing R Information	equired	
(3018)	If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:	(Yes/No)		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers			
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	L		
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers			
(3023)	Underlying information subjected to a review by an independent certified public accountant			
(3024)	Underlying information subjected to an officer certification.			
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows			
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing R Information	equired	

	REDACTED FOR PUBLIC INSPECTION
(3005) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data li	ne <030> 4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data li	ine <030> ksearle@stratanetworks.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

speed and data usage allowances available in the

relevant geographic area.

, ,, ,, ,	
4003b . Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information
Broadband Deployment Locations – FCC 14-98 (par	agraph 80)
4004a . Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information
4004b . Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband	Name of Attached Document Listing Required Information ————————————————————————————————————

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier: UBTA-UBET Communications, Inc

Signature of Authorized Officer: CERTIFIED ONLINE Date 06/28/2016

Printed name of Authorized Officer: Karl Searle

Title or position of Authorized Officer: Chief FInancial Officer

Telephone number of Authorized Officer: 4356224752 ext.

Study Area Code of Reporting Carrier: 502287 Filing Due Date for this form: 07/01/2016

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

	ion - Agent / Carrier ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

	is authorized to submit the information reported on behalf of the reporting car my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authori d data provided to the authorized agent is accurate.	
Name of Authorized Agent:		
Name of Reporting Carrier:		
Signature of Authorized Officer:	Date:	
Printed name of Authorized Officer:		
Title or position of Authorized Officer:		
Telephone number of Authorized Officer:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	
Persons willfully making false statements on this	can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent	Authorized to File Annual Reports for CAF or LI Recipie	ents on Behalf of Reporting Carrier
	norized to submit the annual reports for universal service support reporting carrier; and, to the best of my knowledge, the informat	
Name of Reporting Carrier:		
Name of Authorized Agent Firm:		
Signature of Authorized Agent or Employee of Agent:		Date:
Name of Authorized Agent Employee:		
Title or position of Authorized Agent or Employee of Agen	t	
Telephone number of Authorized Agent or Employee of A	gent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	
	n can be punished by fine or forfeiture under the Communications Act of 18 of the United States Code, 18 U.S.C. § 1001.	1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title

Attachments

ATTACHMENT - LINE 112

Five-Year Network Improvement Plan and Progress Report

ATTACHMENT REDACTED IN ENTIRETY

UBTA-UBET Communications, Inc.'s demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules for voice and broadband services.

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." ² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis. ³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our

UBTA-UBET Communications, Inc. ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under the Utah Service Rules for Telecommunications Corporations. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of Utah Public Service Commission which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

requirement."4

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

require billing procedures (R746-240-4) and procedures for responding to and resolving consumer disputes (R746-240-7); (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy. Pursuant to Telecommunications Service Rule R746-240-1.H, the Company provides a copy of "Customer's Statement of Rights and Responsibilities" as approved by the Utah Public Service Commission to all account holders.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

UBTA-UBET Communications, Inc.'s demonstration of ability to function in emergency situations for voice and broadband services.

UBTA-UBET Communications, Inc. hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2). The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company's central office can maintain 8 hours battery reserve rated for peak traffic load requirements, and a permanent auxiliary power unit is installed which can be delivered and connected within four hours. The Company has battery backup at all office locations and in its electronic equipment sites capable of running for a minimum of 8 hours. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are

is capable of managing traffic spikes resulting from emergency situations."

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and

installed at all Central Office locations. They will continue to run as long as the Company has access to fuel. The Company tests the batteries at least once per year.

UBTA-UBET Communications, Inc.'s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<701> Residential Local Service Charge Effective Date

1/1/2016

Single State-wide Residential Local Service Charge

<703>

<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
				Residential Local			Mandatory Extended Area	
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
UT	Altamont		FR	16.5	0.0	0.22	5.75	22.47
UT	Duchesne		FR	16.5	0.0	0.2	3.25	19.95
UT	Flattop		FR	16.5	0.0	0.22	5.75	22.47
UT	Fruitland		FR	16.5	0.0	0.22	5.75	22.47
UT	Lapoint		FR	16.5	0.0	0.22	5.75	22.47
UT	Neola		FR	16.5	0.0	0.22	5.75	22.47
UT	Randlett		FR	16.5	0.0	0.22	5.75	22.47
UT	Roosevelt		FR	16.5	0.0	0.19	2.25	18.94
UT	Tabiona		FR	16.5	0.0	0.22	5.75	22.47
UT	Vernal		FR	16.5	0.0	0.18	1.8	18.48
	_				_	_	·	

(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c> <d1></d1></c>	<d2></d2>	<d3></d3>		<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	UT	All	39.99	0.0	39.99	6.0	1.0	999999	Other, No limit on usage allowance
	UT	All	44.99	0.0	44.99	15.0	1.0	999999	Other, No limit on usage allowance/limit to facilities
	UT	All	49.99	0.0	49.99	15.0	3.0	999999	Other, No limit on usage allowance/limit to facilities Other, No limit on usage
	UT	All	59.99	0.0	59.99	50.0	5.0	999999	Other, No limit on usage allowance/limit to FTTH facility
	L						I		

	(800) Operating Companies	FCC Form 481
	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013		July 2013

<010>	Study Area Code		502287
<015>	Study Area Name		UBTA-UBET Communications, Inc
<020>	Program Year		2017
<030>	Contact Name - Person US	AC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number	er - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - En	nail Address of person identified in data line <030>	ksearle@stratanetworks.com
<810>	Reporting Carrier	UBTA-UBET Communications	
<811>	Holding Company	Not Applicable	
<812>	Operating Company	UBTA-UBET Communications	

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
<u> </u>	UBTA-UBET Communications	502287	UBTA Communications
	UBTA-UBET Communications	502287	UBTA
	UBTA-UBET Communications	502287	UBET Communications
	UBTA-UBET Communications	502287	STRATA Networks
	UBTA-UBET Communications	502287	STRATA Wireless
	Uintah Basin Electronic Telecommunications, LLC.		UBET Wireless
	Uintah Basin Electronic Telecommunications, LLC.		UBET Cellular
	Uintah Basin Electronic Telecommunications, LLC.		UBET
	Uintah Basin Electronic Telecommunications, LLC.		UBTANet
	Uintah Basin Electronic Telecommunications, LLC.		UBET Wireline Cellular & Pager
	Uintah Basin Electronic Telecommunications, LLC.		Uintah Basin Internet (UBIN)
	Uintah Basin Electronic Telecommunications		Uintah Basin Worldwide Internet

File Name: 502287UT920

Study Area Code: 502287

Study Area Name: UBTA-UBET Communications

Program Year: 2015

UBTA-UBET Communications' service area includes providing landline services to the UTE Indian Tribe – Uintah & Ouray.

During the year 2015 UBTA-UBET Communications complied with the requirements of 47 CFR § 54.313(a)(9), Tribal Engagement Obligations, including, (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) Feasibility and sustainability planning; (iii) Marketing services in a culturally sensitive manner; (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements.

I. §54.313(a)(9)(i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions.

While communication services have been provided to the Tribal community since the early beginning of UBTA-UBET Communications in 1954, and overtime to all Tribal Anchor institutions, the Tribe decided that as a sovereign nation, it needed to have its own fiber between key locations and institutions. Working together, the Tribal government and UBTA-UBET Communications determined the best solution was for UBTA-UBET Communications to place the fiber according to the engineered plans. The fiber was successfully put in place as desired and the network is up and operational.

UBTA-UBET communications works with the Tribe to understand their needs and plans to assure services are available as needed. Services of UBTA-UBET are available to Tribe members and Tribal locations and are provided on a non-discriminatory basis.

II. §54.313(a)(9)(ii) Feasibility and sustainability planning.

UBTA-UBET Communications and the UTE Indian Tribe have been working in cooperation since 1954, together we have proven the feasibility and sustainability of communication services to the Tribal area. Through the needs assessment and deployment planning process the need for fiber facilities to the Tribal Fish Hatchery was identified. Throughout the year 2012 to today, we have worked with the Tribe to place the fiber to the Fish Hatchery. While that project has been delayed due to some right-of-ways not yet acquired, the project remains a unified effort and is moving forward at this time. This fiber project was the result of communicating with the Tribal government regarding the services available versus the services needed.

While placing the Tribal owned fiber to Tribal Anchor Institutions, communications between both parties continued. Those communications identified that for the best use of the fiber and its planned connections, the fiber needed extended beyond the original plan. The feasibility of the extensions was discussed and evaluated and the conclusion was made that the fiber extensions would be sustainable. This collaboration resulted in a fiber architecture connecting the anchor institutions of the Tribe enhancing and sustaining its efforts related to sovereignty. In 2013, fiber was extended and connected essential Tribal locations. These included the Supermarket, coffee shop and the Senior Center.

III. §54.313(a)(9)(iii) Marketing services in a culturally sensitive manner.

Working with the Tribal government and leadership, specific opportunities via current tribal information and education programs have been identified to promote awareness of lifeline services and employment opportunities. This has resulted in improving the dissemination of this important information.

IV. §54.313(a)(9)(iv) Rights of way process, land use permitting, facilities siting, environmental and cultural preservation review processes.

The Tribal government keeps UBTA-UBET Communications informed of the processes required for Rights of Way, land use permitting and facilities siting. UBTA-UBET Communications works with the appropriate Tribal offices and designee to assure full compliance with the Tribal processes.

UBTA-UBET Communications works in unison with the Tribe to assure environmental and cultural preservation needs are not overlooked or harmed.

V. §54.313(a)(9)(v) Compliance with Tribal business and licensing requirements.

During 2014 UBTA-UBET Communications complied with all business licensing requirements, UTERO and all access permitting of the Tribe through-out the year 2015.

Response to Line 1010 UBTA-UBET Communications, Inc. Study Area 502287

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) UBTA-UBET Communications, Inc. ("UBTA-UBET") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$41.07 as specified in Public Notice DA 16-362 issued on April 5, 2016. TABLE 1 demonstrates that UBTA-UBET's current total local end-user rate¹ is not above the standard deviation as specified in the USF/ICC Transformation Order. ²

TABLE 1

Exchange	R1 Rate	Mandatory	State SLC	State USF	Total Rate
		EAS			
Altamont	\$16.50	\$5.75		\$0.22	\$22.47
Duchesne	\$16.50	\$3.25		\$0.20	\$19.95
Flat Top	\$16.50	\$5.75		\$0.22	\$22.47
Fruitland	\$16.50	\$5.75		\$0.22	\$22.47
Lapoint	\$16.50	\$5.75		\$0.22	\$22.47
Neola	\$16.50	\$5.75		\$0.22	\$22.47
Randlett	\$16.50	\$5.75		\$0.22	\$22.47
Roosevelt	\$16.50	\$2.25		\$0.19	\$18.94
Tabiona	\$16.50	\$5.75		\$0.22	\$22.47
Vernal	\$16.50	\$1.80		\$0.18	\$18.48

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Response to Line 1030 UBTA-UBET Communications, Inc. Study Area 502287

Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (1) UBTA-UBET Communications, Inc. ("UBTA-UBET") charges a residential rate of \$44.99 for broadband providing 15 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.80, which is the 2015 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.¹

¹ Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

1st Revised Sheet No. 28 Cancels Original Sheet No. 28

NETWORK ACCESS LINE SERVICE

RATES <u>Monthly Rate</u>

Per Access Line	Residence	<u>Business</u>
One-Party Service	\$ 16.50 (1FR)	\$ 26.00 (1FB)
PBX Trunk		1 1/2 x Business Access Line Rate (PBXFL)
PBX Outward Only		\$26.00 (PBXOW)
Key System		1 1/2 x Business Access Line Rate (PBXFL)
Family Line	\$16.50 (1FL)	
Extended Area Service		
Vernal Area (789 & 781)	\$ 1.80 (EASV)	\$ 1.80 (EASV)
Roosevelt Area (722 & 725)	2.25 (EASR)	2.25 (EASR)
Duchesne Area (738)	3.25 (EASD)	3.25 (EASD)
All other areas (454, 353,		
247, 545, 646, 848, 548)	5.75 (EASU)	5.75 (EASU)

CONDITIONS

The above rates apply to the provision of network access lines which, when connected to a suitable instrument provides access to the telecommunications network.

Instruments must be provided by the subscriber, subject to the conditions described in the Connection With Subscriber-Owned Equipment portion of this tariff.

Additional instruments may be attached to network access lines. The Company reserves the right to limit the number of instruments connected to an access line if they cause interference with the normal operation of the line.

Touch-Tone service is provided only where the facilities are available.

PBX Outward Only allows only outgoing calls from the customer's PBX or Key System. It provides access to 911, dial tone, operator services, and long distance services, but does not allow incoming calls.

2. RATES

A. Baseline Lifeline is a reduction or credit in the local service charges normally paid by qualifying low-income consumers. The reduction to the normal residential one-party rates are as follows:

Residential Access Lines	Monthly Credit or Discount
Federal Baseline Lifeline Reduction	\$ 9.25
Federally Funded Reduction in Local Rate	\$ 2.75
State Matching Local Rate Reduction	\$ 3.50

These reductions or credits are from the normal residential one-party service subscribed to by the consumer. The Federal Baseline Lifeline reduction shall be used to waive the consumer's Federal End-User Common Line Charge or Subscriber Line Charge.

In addition to the above Federal Service Discount, the State may provide an additional discount for eligible consumers, pursuant to Public Service Commission of Utah Rules R746-341. The State Discount is only provided if it is funded through the State's Universal Service Fund.

In no case will the discount exceed the rate charged for the service subscribed to by each individual.

- B. The following services are included:
 - 1. Single party, voice grade access to the Public Switched Network
 - 2. Access to emergency services
 - 3. Access to operator services
 - 4. Access to interexchange services, unless toll blocking is chosen
 - 5. Access to directory assistance
 - 6. Toll Blocking
 - 7. Extended Area Service

C. Tribal Lifeline

1. Tribal Lifeline will consist of up to an additional \$25 per month, per primary residential connection for qualifying low-income individuals living on qualifying tribal lands.

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LIFELINE (Cont'd)

- 2. RATES (Cont'd)
 - C. Tribal Lifeline (Cont'd)
 - 2. Tribal Lifeline benefits apply to the primary local residential access line. This additional federal Lifeline support will be provided to reduce the qualifying customer's basic monthly service rate to \$1.00 per month.

3. LIFE LINE ELIGIBILITY REQUIREMENTS

- A. An applicant must meet eligibility requirements established in the Public Service Commission of Utah Rules R746-341.
- B. Customer must complete the approved application for the Utah Telephone Assistance Program (UTAP) and submit the application to UTAP program for eligibility certification.
- C. The customer must be recertified annually by the appropriate state agency
- D. The premises at which the residential service is requested is the applicant's principal place of residence.
- E. There is only one telephone line serving the residential premises eligible for the credit. The residential premises shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic unit.

4. TRIBAL LIFELINE ELIGIBILITY REQUIREMENTS

- A. Residents of tribal lands who qualify for Lifeline based on the requirements listed below are eligible for the Tribal Lifeline benefit if they participate in one or more of the following programs or meet the traditional lifeline eligibility requirements listed above.
 - 1. Bureau of Indian Affairs (BIA) general assistance program,

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LIFELINE (Cont'd)

4. TRIBAL LIFELINE ELIGIBILITY REQUIREMENTS (Cont'd)

A. (Cont'd)

- 2. Tribally administered Temporary Assistance for Needy Families block grant program,
- 3. Head Start programs (only those meeting its income-qualifying standard),
- 4. National School Lunch Program's free lunch program.
- B. The customer must sign, under penalty of perjury a document certifying that such customer receives benefits from at least one of the programs above, and lives within a qualifying area. In addition, the customer must also agree to notify the Company if that customer ceases to participate in the qualifying program or programs.

5. FUNDING

The total cost of providing the State Lifeline program shall be funded from the Utah Universal Service Fund.

6. REGULATIONS

- A. The Telephone Assistance Program credit will begin with the next billing cycle of the company following the date the Company receives a valid application from the customer or when new service is established for a qualifying customer.
- B. The regular service connection charge, move and change charge, and regulations applicable to the service offerings specified in the tariff will apply. The service connection charge and move and change charge to change to or from this program due to eligibility status will be waived.

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LIFELINE (Cont'd)

- 6. REGULATIONS (Cont'd)
 - C. The Lifeline credit will be subject to the following restrictions:
 - 1. Applicant must be head of household or person whose name the property or rental agreement resides.
 - 2. Lifeline credit will only be provided to the applicant's principle residence.
 - 3. The credit will only be applicable for one single residential access line.
 - D. Lifeline will not be furnished on a Foreign Exchange (FEX) basis.
 - E. Lifeline service shall not be disconnected for non-payment of toll charges.
 - F. If the consumer chooses "toll blocking", the company will not charge a service deposit. Deposits will not be required if customers choose the toll blocking option. No toll blocking charges will be assessed to Lifeline subscribers.
- 7. The Company will offer Lifeline assistance only during such periods as reimbursement of the discount is available to the Company from Federal and/or State revenue sources.

TRIBAL LINK UP

1. GENERAL

Applicable to customers of the Company who apply for basic residential service, and are an eligible resident of Tribal Lands.

2. DESCRIPTION

A. Tribal Link Up consists of a discount, for new service connection charges to connect the customer to the local telephone network. Discount may not be taken on service order or connection charges that pertain to deregulated services such as inside wiring or terminating equipment.

B. Tribal Link Up

Residents on qualifying Tribal lands (reservations) who qualify for Tribal Lifeline are eligible for a Link Up benefit of up to \$100. The benefit will apply towards 100% of the connection charges between \$60.00 and \$130.00, which are assessed to begin service at the primary residence of eligible residence. Eligible charges include any charges customarily assessed to connect the subscriber to the network, including line extension charges, zone charges, and special construction charges.

3. ELIGIBILITY REQUIREMENTS

- A. An applicant must meet all of the following criteria in order to qualify for Link Up.
 - 1. The premises at which the residential service is requested is the applicant's principal place of residence.
 - 2. There is only one telephone line serving the residential premises eligible for this discount. The residential premises shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic unit.
 - 3. An applicant who is an eligible resident of Tribal lands must meet the Tribal Lifeline requirements noted in this tariff in the preceding Lifeline section.

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LINK UP (Cont'd)

- 3. ELIGIBILITY REQUIREMENTS (Cont'd)
 - B. Link Up will not be furnished on a Foreign Exchange (FEX) basis.
 - C. Lifeline qualifying customers are entitled to a reduction of the connection charges once every twelve (12) months.
- 4. Link Up Assistance will not apply to:
 - A. Any business service.
 - B. Any optional residential services such as a custom calling feature.
 - C. Any private line services whether for residential use or otherwise.
 - D. Deposits used for the establishment of credit.
 - E. Any monthly recurring charges.
- 5. The Company will offer Link Up Assistance only during such periods as reimbursement of the discount is available to the Company from Federal and/or State revenue sources.

UBTA-UBET Communications, Inc. (SAC 502287)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

UBTA-UBET Communications, Inc. hereby certifies that throughout 2015, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, UBTA-UBET Communications, Inc. offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

ATTACHMENT - LINE 3017 ATTACHMENT REDACTED IN ENTIRETY